

## United States District Court

for the

Southern District of Texas

UNITED STATES OF AMERICA )

V. )

Anthony Blake WEST ) Case Number:

Kristi Lynn PARKER )

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of December 18, 2019 in the county of Jim Hogg in the  
 (Date)  
Southern District of Texas, the defendant(s) violated:

*Code Section**Offense Description*Title 8 United States Code, Section  
1324

**Knowing and in reckless disregard of the fact that a certain alien had come to, entered, and remained in the United States in violation of law, did transport and move, attempt to transport and move, and conspire to transport and move such alien within the United States, by means of transportation and otherwise, in furtherance of such violation of law.**

This criminal complaint is based on these facts:

See attachment "A".

☒ Continued on the attached sheet.

/s/ Jacob Nissen

Complainant's Signature

**Jacob Nissen, Special Agent**

Printed Name and Title

Sworn to before me and signed in my presence,

Date: December 20, 2019

Judge's Signature

City and State: Laredo, Texas**Diana Song Quiroga, U.S. Magistrate Judge**

Printed Name and Title

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**Anthony Blake WEST****Kristi Lynn PARKER****[CONT OF BASIS OF COMPLAINT]**

1. On December 18, 2019, at approximately 3:30 p.m., United States Border Patrol (USBP) Agents (BPAs) from the Hebbronville Station (HEB) recieved a request for assistance from the Jim Hogg County Sherriff Office (JHCSO) regarding a possible alien smuggling event. JHCSO reported an off duty deputy had witnessed several subjects run out from the brush near Sigrid Street in Hebbronville, Texas and jump into a light colored van. JHCSO deputies responded to the area and observed a van, later identified as a white 2020 Chrysler Pacifica (hereinafter referred to as the VAN) bearing Texas license plates leaving the area and run a stop sign. JHCSO deputies initiated a traffic stop for the disregard of a stop sign violation and noticed several subjects in the VAN. JHCSO then requested assitance from BPAs to conduct an immigration inspection on the occupants of the VAN. BPAs determined the driver, later identified as Anthony Blake WEST, and the front seat passenger, later identified as Kristi Lynn PARKER, were United States Citizens. The remaining six (6) subjects in the rear passenger compartment were found to be citizens of Honduras and El Salvador illegally present in the United States. JHCSO deputies issued WEST a citation for disregard of stop sign and impounded the VAN.

2. BPAs detained WEST and PARKER along with the six (6) undocumented aliens (UDAs). BPAs then contacted Homeland Security Investigations (HSI) Special Agents (SAs) for investigative assistance for an alien smuggling case.

3. WEST was advised of his Miranda warnings, to which he freely waived and agreed to speak to HSI SAs without a lawyer present. WEST stated PARKER had contacted him earlier that morning to drive with her to pick up a "friend" in Hebbronville, Texas. WEST stated that he was to be paid nine hundred United States dollars (\$900 USD) to drive the VAN. WEST stated PARKER had told him via text messages that PARKER was to be paid one thousand eight hundred USD (\$1,800) and WEST suggested splitting it, to which PARKER agreed to half minus expenses. WEST stated he was unaware that this would be to smuggle people but thought it might be something illegal possibly drugs as both he and PARKER use methamphetamine. WEST stated that on the drive to Hebbronville, PARKER received multiple calls on her cellular phone but was unable to overhear any of the conversation. When they arrived in Hebbronville, Texas, PARKER was talking to a subject on her phone and PARKER directed him to drive down Sigrid Street. WEST stated PARKER told him to honk the horn several times and PARKER put the phone on speaker. WEST stated he heard the caller tell them to honk the horn and several other voices speaking spanish in the background. WEST stated he then saw several subjects come out from the nearby brush next to the road and run towards the car. WEST stated PARKER used the automatic door opener to open the rear sliding doors and the subjects got in. WEST stated he started driving but stopped as soon as he saw the emergency lights of the JHCSO deputy's vehicle.

4. PARKER was advised of her Miranda warnings, to which she freely waived and agreed to speak to HSI SAs without a lawyer present. PARKER stated she had been asked by a friend to give a ride to the friend's cousin and friends. PARKER stated that her friend asked her to do this as a favor and that her friend would repay the favor by taking her Christmas shopping with one thousand eight hundred USD (\$1,800). PARKER stated she knew her friend from two (2) previous jobs where PARKER had been her employee. PARKER stated her friend had picked up PARKER at her residence and drove them to pick up the VAN at a local car rental place in Aransas Pass, Texas. PARKER stated her friend went inside to rent the VAN and came back out to give her the keys. While her friend was inside, PARKER stated she contacted WEST and WEST agreed to drive the VAN and they would "go fifty fifty" for the drive "minus gas." PARKER stated she met WEST at a dollar store where she got snacks and water and they drove to Hebbronville. PARKER stated she texted her friend several times on the trip. PARKER stated she was called by an unidentified female subject and a male subject known as "OSO" when she arrived Hebbronville. PARKER stated they gave directions to Sigrid Street and told her to honk the horn. PARKER stated she saw several subjects come out from a nearby bridge where they were hiding. PARKER stated the subjects ran to the

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VAN, opened the rear sliding doors, and got in. PARKER stated they drove for a short distance before WEST stopped the VAN when he saw the emergency lights of the deputy's car. PARKER stated she did not know the people she was picking up were illegal but stated she didn't think you could get in trouble for transporting people, only if you brought them across the border.

5. Bryan ROMERO-Munguia and Waldyn MUNGUIA-Diaz are being held as material witnesses.

6. Material witness Bryan ROMERO-Munguia stated he made arrangements for him and his cousin, Waldyn MUNGUIA-Diaz with members of a Human Smuggling Organization (HSO) to be smuggled into the United States for two thousand five hundred USD (\$2,500) each. Both are nationals or citizens of Honduras. ROMERO-Munguia stated he swam across the Rio Grande River on December 16, 2019. ROMERO-Munguia stated he was to be smuggled to New Orleans, Louisiana. ROMERO-Munguia stated after he crossed, he was driven to an apartment where other UDAs were located and stayed there two (2) days. ROMERO-Munguia stated they were provided food by an unidentified male who was in charge of the apartment. ROMERO-Munguia stated on December 18, 2019 at approximately 5:00 a.m., he and three (3) other UDAs were picked up in an unidentified vehicle and driven to a remote area where they were dropped off on the side of the road. ROMERO-Munguia stated the driver told them to get out and walk through the brush. ROMERO-Munguia stated they walked for approximately four (4) hours through the brush before they came to a paved road where they waited for approximately five (5) hours. ROMERO-Munguia stated he saw a white van driving on road honking the horn. ROMERO-Munguia stated they ran to the van and got in. ROMERO-Munguia stated the driver was a white male subject with a hat and white shirt. ROMERO-Munguia stated the front passenger was a white female subject with light brown hair that spoke English and gave him a bottle of water. ROMERO-Munguia stated they were driven approximately five (5) minutes before they were pulled over. ROMERO-Munguia identified WEST and PARKER from six-person photographic lineups as the driver and front passenger from the VAN.

7. Material witness Waldyn MUNGUIA-Diaz stated his cousin, Bryan ROMERO-Munguia, made arrangements with members of a Human Smuggling Organization (HSO) for him to be smuggled into the United States for two thousand five hundred USD (\$2,500). MUNGUIA-Diaz stated he swam across the Rio Grande River on December 16, 2019. MUNGUIA-Diaz stated he was to be smuggled to New Orleans, Louisiana with ROMERO-Munguia. MUNGUIA-Diaz stated after he crossed, he was driven to an apartment where other UDAs were located and stayed there two (2) days. MUNGUIA-Diaz stated they were provided food by an unidentified male who lived at the apartment. MUNGUIA-Diaz stated on December 18, 2019 at approximately 5:00 a.m., he and three (3) other UDAs were picked up in an unidentified vehicle and driven to a remote area where they were dropped off on the side of the road. MUNGUIA-Diaz stated the driver told them to get out and walk through the brush. MUNGUIA-Diaz stated they walked for approximately four (4) hours through the brush before they came to a paved road where they waited for approximately five (5) hours. MUNGUIA-Diaz stated he saw a van driving on road honking the horn. MUNGUIA-Diaz stated they ran to the van and got in. MUNGUIA-Diaz stated the driver was a white male subject with a long sleeve white shirt with a motocross design, yellow hair, pierced ears, approximately twenty-eight (28) years old, and spoke English. MUNGUIA-Diaz stated the front passenger was a white female subject with yellow hair that spoke English wearing a long sleeve white shirt, approximately thirty (30) years old, and gave him and his cousin a bottle of water. MUNGUIA-Diaz identified WEST from a six-person photographic lineup as the driver of the VAN. MUNGUIA-Diaz was unable to identify PARKER from a six-person photographic lineup. [END OF AFFIDAVIT]